

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Case No. 1:14-cr-00093-LM

Alkis Nakos

MOTION TO WITHDRAW

NOW COMES Charles J. Keefe, counsel for the Defendant, Alkis Nakos, and requests that this Honorable Court grant counsel's withdrawal from this matter. In support thereof, the Defendant states as follows:

1. On August 24, 2016, the undersigned counsel on behalf of the named Defendant filed a Notice of Appeal in this matter.
2. In the months leading up to this filing, undersigned counsel and the named Defendant engaged in a deteriorating relationship that has now become openly hostile.
3. This hostility included counsel and the Defendant arguing with each other during the Defendant's sentencing hearing.
4. In the most recent conversation between counsel and the Defendant, the parties agreed that counsel should withdraw as there has been an irreparable breakdown in communication between counsel and the Defendant such that counsel cannot sufficiently and properly represent the Defendant any longer.
5. As a result, the Defendant recently filed a *pro se* Notice of Appeal.
6. Counsel hereby certifies that a copy of this motion was this day forwarded to the Defendant.
7. A separate Motion to Withdraw and to Temporarily Stay Appeal has been this day filed with the First Circuit Court of Appeals.

WHEREFORE, the undersigned counsel requests that this Honorable Court:

- A. Grant this Motion to Withdraw;
- B. For such other relief as the Court deems just.

Respectfully submitted,

Date: September 7, 2016

/s/ Charles J. Keefe
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was this day forwarded via United States first class mail to Mr. Alkis Nakos c/o Cheshire County House of Corrections, and to Donald Feith, Esq., AUSA, via ECF.

Date: September 7, 2016

/s/ Charles J. Keefe